



May 22, 2019

Via Electronic Filing

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington D.C., 20554

Re: Notice of Ex-Parte Communication, CG Docket No. 17-59, WC Docket No. 17-97

Dear Ms. Dortch:

On May 20, 2019, Rebekah Johnson, CEO of Numeracle, Inc., met with the Arielle Roth, legal advisor to Commissioner O’Rielly, to discuss the Commission’s efforts to combat illegal and unwanted robocalls and authentication caller ID technologies.

I raised concerns about the use of analytics by voice service providers to perform default blocking on an opt-out basis for consumers. In the attachment presented, evidence was provided around how calls that consumers want to receive are frequently erroneously labeled as “Scam” or “Spam.” Allowing voice service providers to block communications by default on an opt-out basis based on the varied analytics would create inconsistencies as identical lawful calls from the same caller are rated inconsistently even by the same analytics entity. The attached presentation shows that calls from seven phone numbers from the same caller were rated anywhere from low to high risk. One analytics entity rated calls from the same calling campaign by one company all the way from low risk to high risk.

Additionally, carriers and their analytics partners do not inform legal callers of how their calls are labeled and/or blocked. Because of these errors and lack of feedback from carriers and their partners to lawful callers, the voice channel will continue to be rendered a less effective means of communication despite consumer preference to receive voice communications from companies they do business with.

The draft order plays fast and loose with the terms “illegal call” and “unwanted call.” The Commission has never defined these terms. The same sales call that is illegal if the customer has not consented to receive it is perfectly legal with customer consent. Every customer will have their own definition of “unwanted call.” Numeracle supports providing customers with accurate labeling information so they can make informed decisions about whether to answer a call or have certain categories blocked based on their individual preferences.

While Numeracle fully supports the deployment of STIR/SHAKEN by voice service providers, I noted this is not a solution to identify legal vs. illegal or wanted vs unwanted calls. STIR/SHAKEN was designed to provide consistent traceback to determine the originating carrier, but STIR/SHAKEN does not determine

whether a call is legal or illegal, or wanted or unwanted. The need for analytics will remain, but an even more pressing need is the ability for legal callers to identify to carriers and their analytics partners that they are making legal calls from telephone numbers they are authorized to use.

Respectfully submitted,

/s/ Rebekah Johnson, CEO

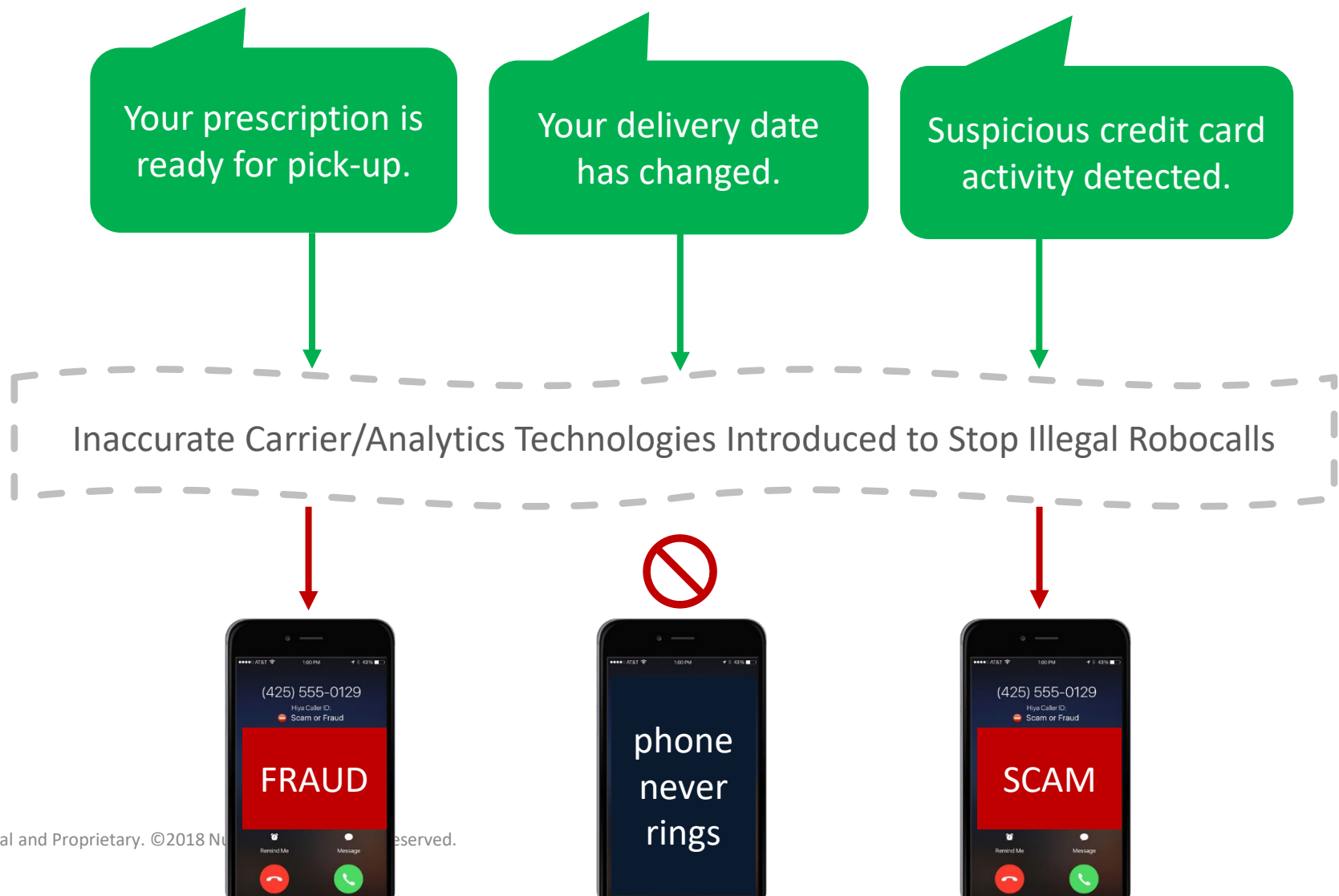
Numeracle, Inc.
McLean, VA
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Numeracle



On a mission to establish trust in customer communications.

Call Blocking & Labeling



Fortune 100 Retail Customer Service Lines

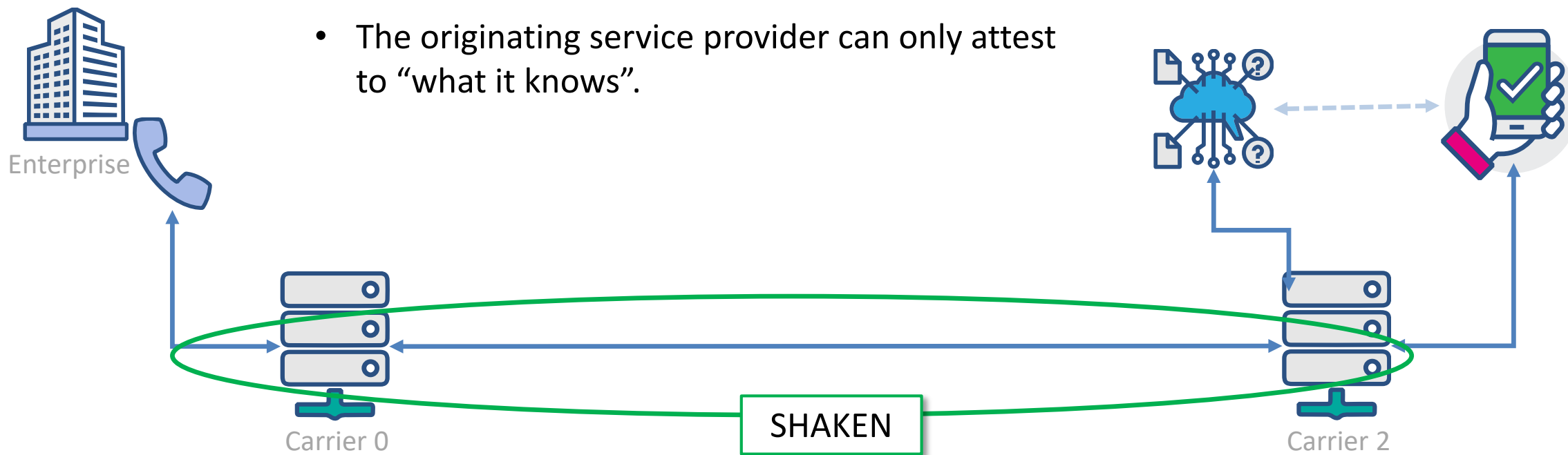
<u>Original TN</u>	<u>Analytics 1</u>	<u>Analytics 2</u>	<u>Analytics 3</u>
844-83#-####	Medium	No Rating	Medium
800-46#-####	High	Low	Medium
800-24#-####	Medium	High	Medium
800-91#-####	Medium	Medium	Low
512-87#-####	Medium	Low	Medium
770-65#-####	High	Low	Medium
866-64#-####	Medium	Medium	Low

Fortune 100 Cable/Internet Provider

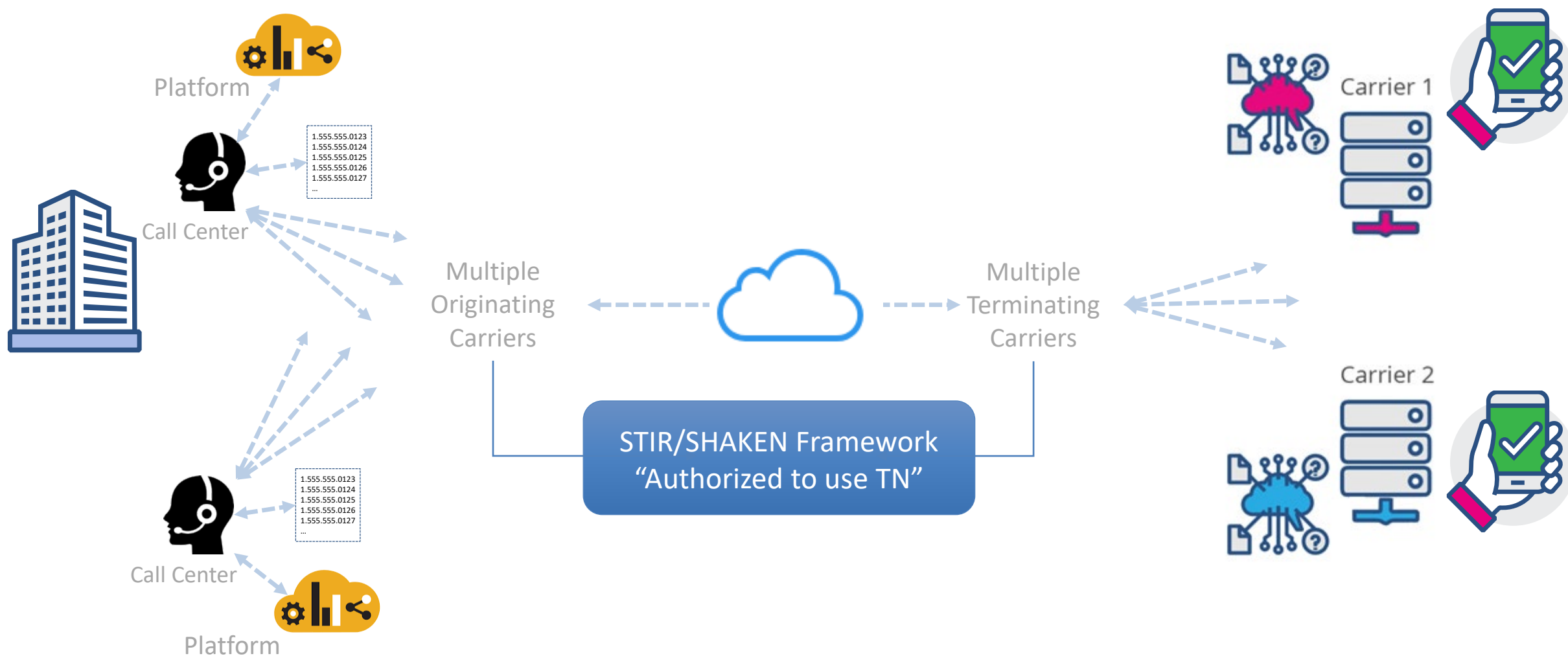
- 4,223,578 call volume for 3 month period
- 55 outbound numbers, representing **72%** of call volume labeled:
 - Nuisance, SCAM, SPAM, Robocaller

SHAKEN

- SHAKEN verifies that the entity originating a call is entitled to use the phone number displayed – nothing more!
- SHAKEN builds on the information the originating carrier has about the calling party.
- The originating service provider can only attest to “what it knows”.

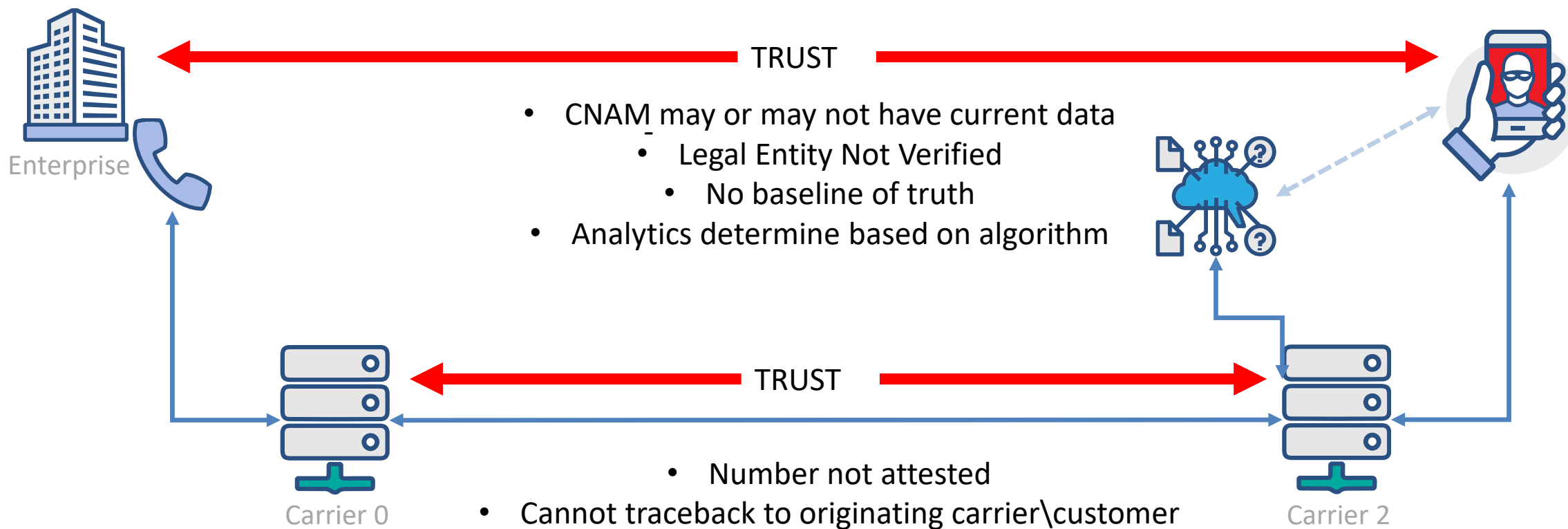


SHAKEN



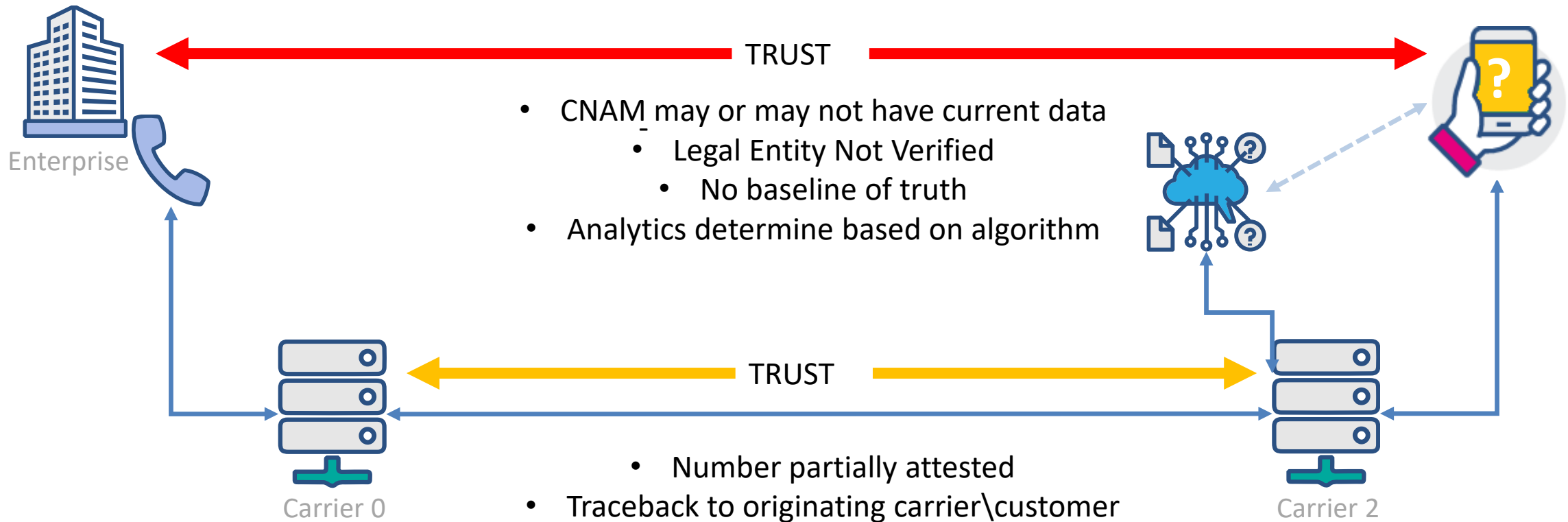
Current Ecosystem

No Trust Between Carriers and Enterprise



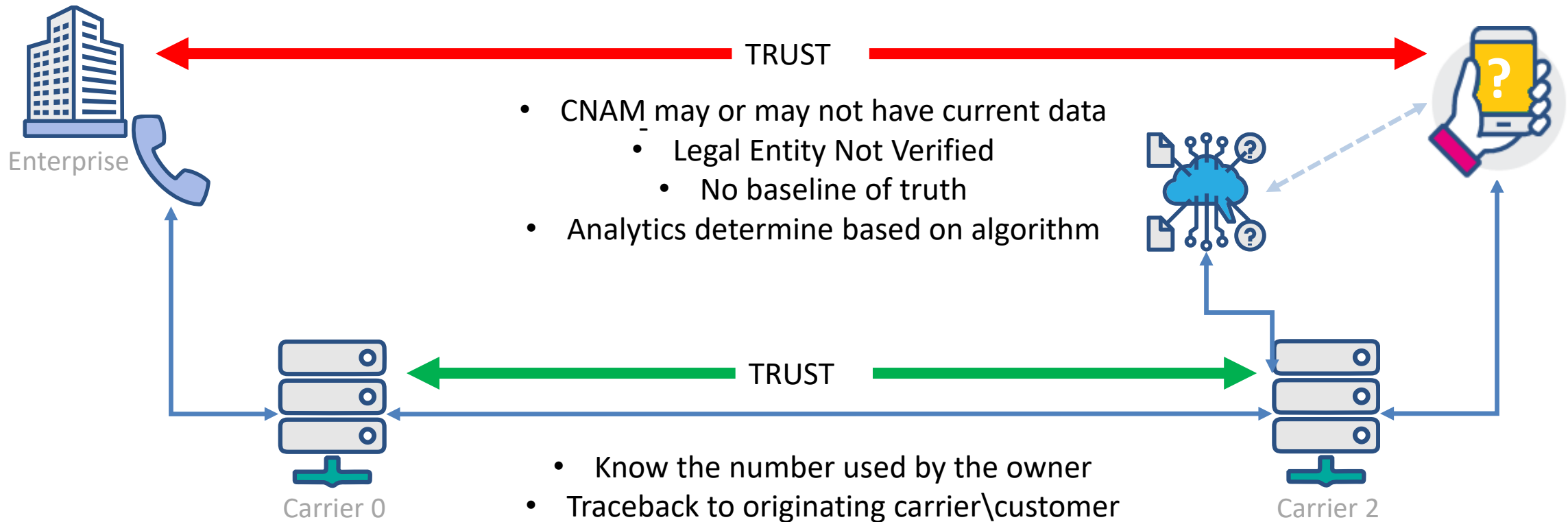
SHAKEN with Partial Attestation

Partial Trust Established Through SHAKEN ONLY



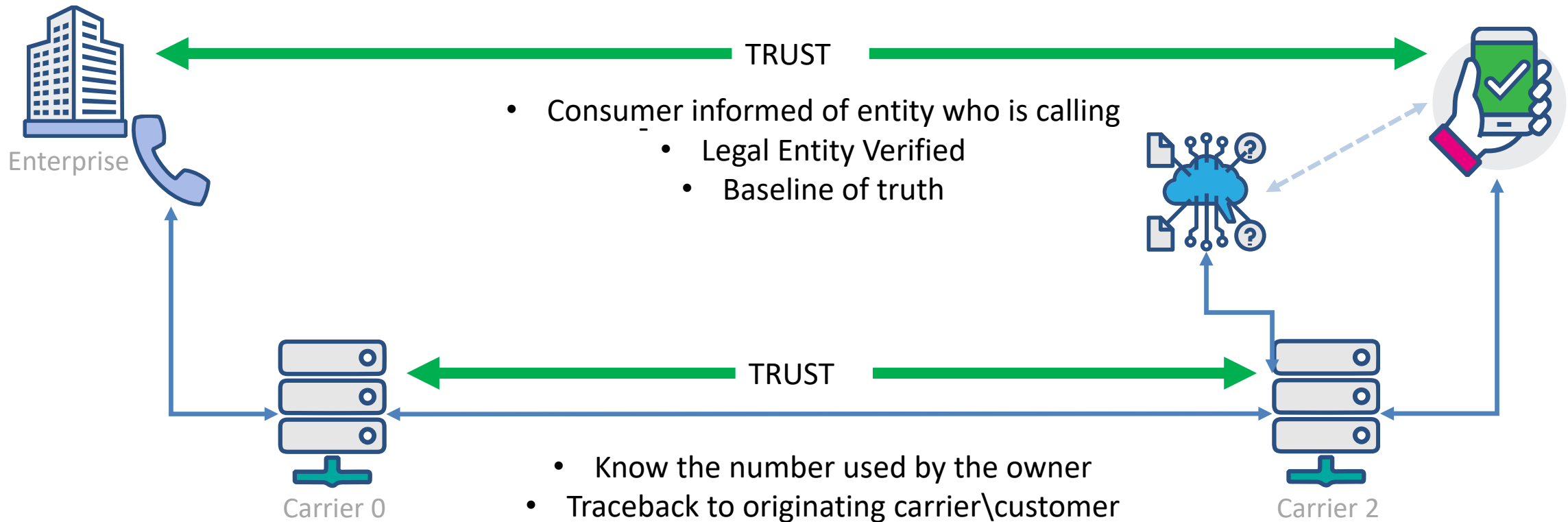
SHAKEN with Full Attestation

Trust Established Through SHAKEN ONLY



SHAKEN + Vetted Entity

Trust Established Through Know Your Customer & SHAKEN





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